

1 ADAM K. YOWELL, Esq., Nevada Bar No. 11748
ayowell@bhfs.com
2 TRAVIS F. CHANCE, Esq., Nevada Bar No. 13800
tchance@bhfs.com
3 MACKENZIE WARREN, ESQ., Nevada Bar No. 14642
mwarren@bhfs.com
4 BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
5 Las Vegas, NV 89106
Telephone: 702.382.2101
6 Facsimile: 702.382.8135

7 *Attorneys for Plaintiff/Counter-Defendant*
Mirek Wierzbowski
8

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 MIREK WIERZBOWSKI, an individual,
12 Plaintiff,
13 v.
14 STEVE DEC, an individual,
15 Defendant.

CASE NO.: 2:13-cv-00076-JAD-NJK

**STIPULATION AND ORDER FOR
EXTENSION OF AMENDED JOINT
PRETRIAL ORDER DEADLINES
(FIRST REQUEST)**

16 STEVE DEC, an individual,
17 Counter-Plaintiff,
18 v.
19 V'GUARA, INC., a Nevada corporation;
20 MIREK WIERZBOWSKI, an individual,,
21 Counter-Defendants.

22 WHEREAS, the trial in this matter was formerly set to begin December 4, 2017;
23 WHEREAS, during a status conference with the Court on November 13, 2017, the Court
24 informed the parties that due to its trial docket, the trial of this matter would not begin until the
25 week of December 11, 2017 at earliest;
26 WHEREAS, during that same status conference, counsel for Plaintiff informed the Court
27 that, due to intervening health conditions and associated treatment, Plaintiff would be unable to
28 be present on either December 4 or the week of December 11, 2017 for trial;

1 WHEREAS, Plaintiff filed a Motion to Continue Trial on November 17, 2017 and
2 Defendant filed an Opposition to that Motion on November 20, 2017;

3 WHEREAS, Plaintiff's Motion to Continue Trial was granted by the Court on November
4 21, 2017 and the trial date was reset to April 10, 2018;

5 WHEREAS, the parties have also been ordered to a mandatory settlement conference;

6 WHEREAS, the Amended Joint Pretrial Order in this case was filed on November 2,
7 2017;

8 WHEREAS, the Amended Joint Pretrial Order requires the parties to file their (1) trial
9 briefs; (2) exhibit and witness lists; (3) proposed jury instructions; and (4) proposed *voir dire*
10 questions (the "Pretrial Materials") by 12:00 P.M. on November 27, 2017;

11 WHEREAS, given the new trial date on April 10, 2018 and the mandatory settlement
12 conference, the parties desire to extend the time to file the Pretrial Materials,

13 //

14 //

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 IT IS THEREFORE STIPULATED by and between the parties that the deadline for filing
2 the Pretrial Materials by each party shall be extended until **12:00 P.M. on April 2, 2018**. This is
3 the first request for an extension of time to file the Pretrial Materials.

4 Respectfully submitted this 22nd day of November, 2017.

5 */s/ Travis F. Chance*
6 ADAM K. YOWELL, Esq.
7 Nevada Bar No. 11748
ayowell@bhfs.com
8 TRAVIS F. CHANCE, Esq.
9 Nevada Bar No. 13800
tchance@bhfs.com
10 MACKENZIE WARREN, ESQ.
11 Nevada Bar No. 14642
mwarren@bhfs.com

12 BROWNSTEIN HYATT FARBER
13 SCHRECK, LLP
14 100 North City Parkway, Suite 1600
15 Las Vegas, NV 89106
16 Telephone: 702.382.2101
17 Facsimile: 702.382.8135

18 *Attorneys for Plaintiff/Counter-Defendant*
19 *Mirek Wierzbowski*

5 */s/ Herbert Terrell*
6 PATRICIA A. MARR, ESQ.
7 Nevada Bar No. 008846
8 2470 St. Rose Parkway, Ste. 111
9 Henderson, Nevada 89074
(702) 353-4225 (telephone)
(702) 912-0088 (facsimile)
10 patricia@marrlawlv.com (email)

11 HERBERT A. TERRELL, ESQ.
12 Pennsylvania Bar No. 26129
13 7232 Roosevelt Street
14 Pittsburgh, PA 15235
(412) 404-8594 (telephone)
(877) 250-7379 (facsimile)
15 haterrell@justice.com (email)
16 *Pro Hac Vice Counsel*

17 *Attorneys for Defendant/Counter-Plaintiff*
18 *Steve Dec*

19 **IT IS SO ORDERED.**

20 
21

22 UNITED STATES DISTRICT JUDGE
23
24
25
26
27
28

11/27/2017